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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

TECHCRUNCH, INC., et al.

Plaintiffs,

vs.

FUSION GARAGE PTE. LTD.,

Defendant.

Case No. 3:09-cv-05812 RS

**JOINT STIPULATION SEEKING STAY
 PENDING SETTLEMENT AND
~~PROPOSED~~ ORDER**

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WHEREAS, the parties in this action have executed a Memorandum of Understanding regarding final settlement of this case;

WHEREAS, the parties believe they will be in a position to execute a definitive agreement within fourteen days;

WHEREAS, the parties are facing imminent deadlines as set forth in the March 31, 2011 Case Management Scheduling Order (Docket Entry 206), as well as deadlines relating to ongoing discovery and motion practice;

WHEREAS, the parties agree that if the anticipated final agreement does not take place, they will jointly seek reasonable rescheduling of all dates, deadlines, motions, and other activities;

NOW THEREFORE, it is hereby stipulated by the undersigned counsel on behalf of the parties identified below that:

All pending deadlines, motions, notices, subpoenas, and hearing dates be suspended or stayed pending anticipated final agreement.

The case be temporarily stayed pending execution of the settlement or a report that the settlement was not executed.

Dated: September 22, 2011

WINSTON & STRAWN LLP

By: /s/
Andrew P. Bridges
David S. Bloch
Attorneys for Plaintiffs

Dated: September 22, 2011

QUINN EMANUEL URQUHART & SULLIVAN, LLP

By: /s/
Claude M. Stern
Evette D. Pennypacker
Attorneys for Defendant

I, Andrew P. Bridges, hereby attest, pursuant to N.D. Cal. General Order No. 45, that the concurrence to the filing of this document has been obtained from each signatory hereto.

By: /s/
Andrew P. Bridges

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PURSUANT TO STIPULATION, IT IS HEREBY ORDERED:

1. This case is hereby STAYED pending anticipated execution of a settlement agreement.

2. All deadlines, motions, notices, subpoenas and hearing dates are SUSPENDED or STAYED. The parties shall report the status of this case to the Court within fourteen days.

Dated: 9/23, 2011
2010



The Honorable Richard Seeborg
United States District Court Judge

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